

2.5 Industrial & Commercial Uses

2.5.1 Introduction

It is estimated that there are tens of thousands commercial/industrial facilities within the City of San Diego's jurisdiction. There are hundreds of industries in the City that are permitted under the State's General Industrial Permit. Achieving compliance for this many facilities is a monumental task. The program described herein has been established to work towards this end. Table 2.5-1 provides a summary of the Municipal Permit requirements and where those requirements are addressed within this component.

Table 2.5-1. Permit Requirements –Commercial/Industrial Facilities.

Section	Requirement (Summary)	Permit Section
2.5.2	Implement pollution prevention methods	F.3.b.(1) F.3.c.(1)
2.5.2	Designate and implement minimum storm water BMPs to protect water quality	F.3.b.(4) F.3.c.(3)
2.5.2	Inspect areas and activities annually	F.3.b (6) F.3.c.(4)
2.5.2	Require implementation of an Educational Program for all pertinent target communities by the appropriate industries	F.4.a F.4.b F.4.c
2.5.2	Report non-compliant industrial sites	F.3.b.(8)
2.5.3	Develop a budget for storm water expenditures at the stadium for each fiscal year covered by the Municipal Permit	F.8
2.5.4	Document activities for Jurisdictional Urban Runoff Management Program Annual Report	I

Because much of the program for commercial and industrial facilities is similar with respect to source identification, prioritizing, inspection and enforcement, they are combined under one component. However, each facility will be categorized as either commercial or industrial, and activities will be differentiated with respect to the prioritization, required storm water BMP implementation, inspection requirements, enforcement, and monitoring.

Principally, the Storm Water Program staff carries out the Commercial/Industrial component of the Urban Runoff Management Plan. Other departments in the City , such as, Environmental Services, Metropolitan Wastewater, and Real Estate Assets will conduct storm water inspections. The County Department of Environmental Health staff will also provide inspections and make referrals to the City when compliance is in question. Currently, the County Department of Environmental Health (DEH) indicates that the following programs will include storm water in their ongoing Countywide

inspection efforts: Department of Environmental Health County Department of Agricultural, Weights and Measures; Department of Environmental Health; and Community Food & Housing Division. It is also anticipated that the County will assist with the distribution of informational materials.

The primary goal of this component is to reduce the quantity of contaminants that enter the City's storm water conveyance system from business facilities within its jurisdiction. To this end, the objectives of this component during the permit period will be:

- Use the facility inventory compiled in Component 1.5, *Inventories*
- Educate commercial/industrial owners and operators regarding regulations and their responsibilities under this program
- Designate minimum pollution prevention requirements and storm water BMPs to be implemented at facilities
- Require implementation storm water BMPs appropriate to the facility's threat to water quality
- Perform routine facility inspections
- Report monitoring data, non-compliant facilities and assessment data (see Component 1.4, *Water Quality Monitoring*)
- Identify a phased implementation schedule to implement the commercial/industrial component through the five-year life of the Municipal Permit
- Document storm water pollution prevention activities conducted at commercial/industrial facilities, which will then be reported annually to the Storm Water Pollution Prevention Program along with an annual assessment form.

2.5.2 Activities

The City's General Services Department currently employs code enforcement staff within the Storm Water Pollution Prevention Program to enforce the storm water ordinance. Each staff member is responsible for patrolling a portion of the City, visually inspecting for storm water violations. In addition, they respond to complaints received from the Storm Water Hotline or referrals from other departments within the City and County. Under the commercial/industrial component, this program will be formalized and expanded per the requirements of the Municipal Permit as described below. Documentation received from the County Department of Environmental Health (DEH) various inspection programs will be used for follow up efforts to ensure compliance.

Source Identification

A watershed-based inventory of known commercial/industrial facilities within the City's jurisdiction will be developed. Component 1.5, *Inventories*, discusses the development of this inventory in more detail. The purpose of this inventory is to assist in identifying

commercial/industrial activities and pollutants, prioritizing commercial/industrial sites according to their potential impacts to the storm water conveyance system, providing a compliance history for each site, and allocating resources for future inspection, enforcement, and outreach efforts.

Prioritize Based on Threat to Water Quality

A more detailed discussion of the prioritization process is provided in Component 1.5, *Inventories*. In general, prioritization involves two steps: initially classifying a facility as being a high, medium, or low priority threat; and subsequently confirming or reclassifying it based on field observations during site inspections and additional information. The initial priority classification is based on the facilities primary activities as described by their SIC code.

Develop & Distribute Educational Material

The education element for commercial/industrial facilities includes general storm water and specific BMP information that facilities can incorporate into employee training and education programs they develop. This will be accomplished as follows:

- Develop overall messages and tailor them to the specific industry or commercial business activities.
- Develop activity-based educational materials in partnership with industry/commercial associations (i.e. food establishments, fueling stations, manufacturing sites)
- Disseminate messages using various established outreach tools available to the industry. For specific methods refer to the Component 1.2-11, *Education*. The city intends to form partnerships with the various commercial (business) groups and industrial associations, and will disseminate the information with a variety of outreach tools as appropriate to each audience. Businesses conducting “High Priority Commercial Activities” will be able to download PDF formatted factsheets containing specified information with tailored cord program messages and BMP information from the www.thinkbluesd.org website. To supplement these efforts, the city will also utilize municipal employees who interact with these sectors—in either an inspection or enforcement capacity—as a source of information (see Component 1.3, *Enforcement of Storm Water Ordinance*).

Designate BMP Implementation

Best management practices are required to be implemented at commercial facilities, and at all industrial facilities.. The commercial/ industrial database is prioritized based on a review of facility location with respect to sensitive water bodies, and facility activity with respect to the potential risk of discharging pollutants into the municipal storm drain

system. In addition, a watershed-based inventory of known commercial/industrial facilities within the City's jurisdiction has been developed. The purpose of this inventory is to assist in identifying commercial/ industrial activities and pollutants, prioritizing commercial/industrial sites according to their potential impacts to the municipal storm drain system, providing a compliance history for each site, and allocating resources for inspection, enforcement, and outreach efforts. A detailed discussion of the inventory can be found in Component 1.5, *Inventories*. The facility prioritization will be used to assist in establishment of inspection requirements. BMPs are established for all facilities. The requirements outlined herein are separated into those required for industrial facilities and those required for commercial facilities. Facilities will be notified of the City's requirements through distributed materials, and during site visits and inspections.

1. Industrial Facility BMPs:

The requirements for industrial sites include non-structural and structural BMPs.

A) Non-Structural BMPs:

Non-structural BMPs consist of procedures and practices that prevent industrial pollutants from entering storm water or authorized non-storm water discharges. Non-structural BMPs are considered minimum requirements of a facility's BMP program. The non-structural BMPs to be implemented at high priority facilities are listed below:

- Good housekeeping;
- Preventive maintenance (including regular maintenance of structural BMPs);
- Material handling and storage of significant materials;
- Employee training;
- Solid waste (non-hazardous) handling and recycling;
- Record keeping;
- Self-inspection/quality assurance
- Spill response procedures and adequate containment/cleanup supplies/ equipment on site at all times;
- Facility map showing at a minimum:
 - Existing impervious structures (paved areas, buildings, covered storage areas, and other roofed structures)
 - Outdoor storage areas
 - Areas of industrial activities (shipping and receiving, fueling, equipment storage, cleaning, etc.)
 - Conveyance systems (sewers and storm drains)
 - Surface drainage patterns (direction of flow)
 - Storm water discharge locations, and
 - Identification of the receiving water that storm flows will enter.
- Posted facility map in clear and visible location.

B) Structural BMPs:

Structural BMPs consist of specialized equipment, structural components, or engineered technologies. The facility operator performs the determination of the effectiveness of controlling pollutants during their self-inspection/quality assurance program, and during inspection or review by the Storm Water Program.

The City has developed a list of required structural BMPs, however, additional activity-based BMPs for specific industrial activities may also be required on a site-by-site basis as determined by inspection or review of a facility's history, location, or activities. Structural BMPs for industrial sites are as follows:

- Minimize rain water contact with all hazardous materials or potential pollutants stored outdoors through implementation of overhead coverage or secondary containment;
- Minimize rain water contact with all areas where hazardous materials or potential pollutants are used outdoors through implementation of runoff diversion, overhead coverage or secondary containment;
- Divert storm water run-on and runoff from pollutant sources to minimize resuspension of pollutants; and
- BMPs as outlined in facility's Industrial General Permit (CAS0000001) Storm Water Pollution Prevention Plan (SWPPP), if applicable.

2. Commercial Facility BMPs:

The requirements for commercial facilities include non-structural and structural BMPs. Non-structural BMPs consist of procedures and practices that prevent pollutants or non-storm water discharges from entering the municipal storm drain system. The non-structural BMPs to be implemented at commercial facilities are listed below:

- Good housekeeping;
- Preventive maintenance;
- Material handling and storage of significant materials;
- Employee training;
- Solid waste (non-hazardous) handling and recycling;
- Record keeping;
- Self inspection/quality assurance
- Spill response procedures and adequate equipment on site at all times; and
- Provisions and procedures for cleaning outdoor surfaces and equipment (sidewalks, buildings, vehicles, restaurant mats, etc.) in a manner that will not result in wash water discharges entering the municipal storm drain system.

Structural BMPs - Structural BMPs consist of specialized equipment, structural components, or engineered technologies. The determination of the effectiveness of controlling pollutants shall be performed by the facility operator during their self-inspection/quality assurance program, and during inspection or review by the Storm Water Program.

The City has developed a list structural BMPs for commercial facilities. However, additional activity-based BMPs for specific activities may also be required on a site-by-site basis as determined by inspection or review of a facility's history, location or activities.

Structural BMPs for commercial facilities are as follows:

- Overhead coverage or secondary containment for all hazardous materials stored outdoors; and
- Overhead coverage of areas where chemical or hazardous material storage are used.

Perform Inspection of Commercial/Industrial Facilities

The goal of the inspections is to ensure that runoff pollutants have been reduced to the maximum extent practicable or to technology-based standards, if applicable. This is accomplished by checking for evidence of non-stormwater discharges, verifying BMP implementation and assessing BMP effectiveness. Inspectors may also provide educational materials and technical or regulatory updates, refer the business to BMP reference resources, review SWPPPs and provide feedback about BMPs appropriate for a given activity, and identify any illicit discharges and connections to the municipal storm drain system. The inspections also provide an opportunity to verify and/or collect additional information for updating the watershed-based inventory database.

Site inspections are conducted of commercial/industrial facilities within the City's jurisdiction using staff within the City's Storm Water program as well as by the City's Metropolitan Waste Water Department, Regional Board, County Department of Environmental Health, County Hazardous Materials staff, and County Department of Agriculture, Weights & Measures (for pesticides).

1. Facility Inspections

Inspections are performed by physically visiting the facilities. City Storm Water Staff will use the inventory database to initially obtain baseline facility information. This data will be used to focus the on-site inspection efforts on issues related to storm water and BMP implementation. An inspection sheet, provided in Appendix 2.5-B, is filled out to help guide the inspection and ensure that adequate data is collected at each facility. Photographs are also taken to document findings.

The Storm Water Program staff will coordinate with the City's Metropolitan Waste Water Department, County Department of Environmental Health, and County Hazardous Materials staff, who conduct facility inspections based on their priorities, and review these inspections sheets for possible non-compliant or high risk activities. When these activities are identified from initial inspections, Storm Water Program staff will perform follow up inspections. The inspections will also provide verification data for the facility inventory.

When, based on the site inspection, a violation of Federal, state or local regulations have been observed, follow up procedures will be followed. Follow up activities include follow up communication with the facility in the form of phone calls or letters. The purpose of this communication is to provide additional education and verification that corrective action is being taken. When facilities are not adequately addressing compliance issues, the facility will be turned over to the enforcement section of the Storm Water Program.

Establishing good record keeping procedures during the inspection, follow-up and enforcement process is critical. When follow-up action is necessary, individual files will be prepared containing results of all inspections, photographs and communications related to the facility.

2. Inspection Frequencies

The required frequencies for inspections is different for industrial and commercial facilities, therefore they are described separately below.

A) High Priority Industrial Facilities:

High-priority industrial facilities are planned to be inspected annually, or bi-annually (every two years) if the City: (a) has a record of the site's Waste Discharge Identification Number; (b) has reviewed, approved, and confirmed proper implementation of the site's Storm Water Pollution Prevention Plan (SWPPP); *and* (c) has submitted a certified statement to the Regional Board verifying that the site has complied with these requirements.

B) Low and Medium Priority Industrial Facilities:

Low and medium priority facilities are inspected as determined necessary by the Copermittee. Site inspections are triggered by complaints, referrals from the IC/ID program or other agencies, or direct visual observation of activities that could potentially discharge pollutants into the municipal storm drain system.

C) High Priority Commercial Facilities:

High priority commercial facilities are inspected as determined necessary by the Copermittee. Site inspections are triggered by complaints, referrals from the IC/ID program or other agencies, or direct visual observation of activities that could potentially discharge pollutants into the municipal storm drain system.

Enforcement of Regulations at Commercial/Industrial Facilities

Inspections or complaint investigations of commercial/industrial facilities may result in situations requiring enforcement action. Enforcement of storm water regulations are conducted by staff members with enforcement authority and, when necessary, by legal counsel. The inspectors, in accordance with the existing procedures for recording violations, will document properly each observed violation. Depending on the severity of the violation, enforcement can range from a notice of violation to large fines. A more detailed discussion of the enforcement program for commercial/industrial facilities is provided in Component 1.3, *Enforcement of Storm Water Ordinances*.

Monitoring of Industrial Facilities

The City required that high priority industrial facilities implement monitoring programs for runoff from their facilities. The details of this program are provided in Component 1.4, *Water Quality Monitoring*.

Documentation/Reporting

Documentation and reporting is an important part of this element in order to track, assess and improve the commercial/industrial component of the storm water program. The tasks that will be performed for this element are as follows:

- Develop forms for easy recording and inputting into database
- Develop recording and inputting standards and procedures
- Implement procedures

The Storm Water Program will develop an inspection form/ checklist to be used by all departments conducting inspections within the City to insure consistency. Inspection records will be maintained by the Storm Water Program for all inspections conducted by City staff.

Non-compliant sites that are deemed to pose a significant threat to water quality or human health will be verbally reported to the Regional Board within 24 hours of discovery of the incident. A follow-up report will be submitted within 5 days of discovery of the incident. A significant threat to water quality or human health is determined by the City on a case-by-case basis and will be dependent on the type of pollutant, the

degree of the violation (i.e. the amount of pollutant discharged into the municipal storm drain system), the proximity to sensitive habitat or water bodies, the potential for exposure to the public, and the potential for environmental damage.

2.5.3 Phasing

Year 1 (July 1, 2001 – June 30, 2002):

- Develop cooperative partnerships with industry and trade associations
- Develop outreach plan with trade and industry associations
- Develop and facilitate dissemination of educational material regarding BMP requirements
- Develop and implement inspection procedures
- Coordinate with the City's Metropolitan Waste Water Department, the Regional Board, County Department of Environmental Health, and County Hazardous Materials staff
- Train coordinated inspection staff
- Develop forms for easy recording and inputting into database
- Develop recording and inputting standards and procedures
- Prepare Annual Report with assessment conclusions and recommendations.

Year 2 (July 1, 2002 – June 30, 2003):

- Adjust program based on conclusions and recommendations of Annual Report.
- Verify and update inventory database
- Perform routine inspections
- Develop and facilitate dissemination of educational material regarding BMP requirements
- Implement documentation and reporting procedures
- Prepare Annual Report with assessment conclusions and recommendations.

Year 3 (July 1, 2003 – June 30, 2004):

- Adjust program based on conclusions and recommendations of Annual Report.
- Perform routine inspections
- Continue to facilitate dissemination of educational material
- Verify and update inventory database
- Prepare Annual Report with assessment conclusions and recommendations.

Year 4 (July 1, 2004 – June 30, 2005):

- Adjust program based on conclusions and recommendations of Annual Report.
- Continue to facilitate dissemination of educational material
- Perform routine inspections
- Verify and update inventory database
- Prepare Annual Report with assessment conclusions and recommendations.

Year 5 (July 1, 2005 – June 30, 2006):

- Adjust program based on conclusions and recommendations of Annual Report.
- Continue to facilitate dissemination of educational material
- Perform routine inspections
- Verify and update inventory database
- Prepare Annual Report with assessment conclusions and recommendations.

Actual implementation of the activities listed above is dependent upon identification of funding in future yearly budgets and City Council approval.

2.5.4 Annual Assessment

The following form is representative of the quantitative and qualitative measures that will be tracked by the Storm Water Program regarding the Industrial & Commercial component in order to prepare the Jurisdictional Urban Runoff Management Program annual assessment. *These assessment factors and questions are presented for information only; some questions may be modified prior to each annual assessment period, and not all of the factors or questions below may apply to each component's responsible department(s).* Prior to each fiscal year, a tailored Annual Assessment Form will be distributed to responsible departments, and will include an Excel spreadsheet containing direct and indirect quantitative and qualitative measures similar to the example below. The Storm Water Program will provide a blank copy of the Annual Assessment Form and additional guidance to department management prior to the beginning of each fiscal year. Submission of this report will require department director approval.

Program Assessment Reporting Form - Industrial & Commercial Component

QUANTITATIVE ASSESSMENT:

Activity	Quantity	Units	Explanations (if needed)
Industrial Activities:			
Number of high priority facilities identified		#	
Number of high priority facilities targeted for inspection		#	Due to calendar-year vs. fiscal year, staffing, budget, etc., as well as Permit Section F.3.b.(6)(d), the number of sites targeted for inspection may be less than the actual number of sites.
Number of high priority facilities inspected		#	Number of sites (not the number of inspections, which may or may not be the same).
Number of medium and low priority industrial facilities inspected		#	See above.
Number of facilities in compliance or on a compliance schedule		#	
Number of facilities referred to RWQCB for enforcement of State General Industrial Permit		#	Equals number of facilities that are subject to State General Industrial Permit, but have not filed NOI or may be in violation of General Permit (e.g. no SWPPP, etc.)

Activity	Quantity	Units	Explanations (if needed)
Commercial Activities:			
Number of high priority facilities inspected		#	Number of sites (not the number of inspections, which may or may not be the same).
Number of medium and low priority commercial facilities inspected		#	See above.
Number of facilities in compliance or on a compliance schedule		#	

QUALITATIVE ASSESSMENT:

1. Describe the major accomplishments of the Industrial & Commercial Component over the past year.

2. Summarize the internal and external educational and outreach activities this component has conducted over the past year.

3. Summarize new activities or improvements to be implemented next year as a result of your self assessment.

4. Other comments.

FINANCIAL ASSESSMENT:

Estimated annual storm water expenditures:

Personnel Expenditures: _____
Non-personnel Expenditures: _____